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COMMONWEALTH OF MASSACHUSETTS DEPARTMENT OF TELECOMMUNICATIONS AND ENERGY

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)  
Investigation by the Department on its own )  
Motion as to the propriety of the rates and )  
charges set forth in M.D.T.E No. 17, filed with )  
the Department on May 5, 2000 to become ) D.T.E. 98-57, Phase III  
effective June 4 and June 6, 2000 by New )  
England Telephone and Telegraph Company )  
d/b/a Bell Atlantic - Massachusetts )  
\_\_\_\_\_)

SECOND SET OF INFORMATION REQUESTS OF COVAD  
COMMUNICATIONS COMPANY TO VERIZON MASSACHUSETTS, INC.

Covad Communications Company ("Covad"), requests that Verizon Massachusetts, Inc. ("Verizon") respond to the following information requests addressed to it in the above-captioned proceeding.

These requests shall be deemed continuing so as to require further and supplemental responses if Verizon or its representative receives or generates additional information within the scope of these requests between the time of the original responses and the end of hearings in this proceeding.

All responses should conform to the specifications as given in the Definitions and Instructions, with respect to dates, documents, claims or privileges, etc.

If Verizon feels that any request is ambiguous, please notify Covad so that the request may be clarified prior to the preparation of a written response.

DEFINITIONS AND INSTRUCTIONS

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A. With respect to each question, please state: (1) the name(s) and title(s) of the person or persons responsible for preparing the response; (2) the name(s) and title(s) of the person or persons who would be competent to testify concerning the response, whether or not that person will be called as part of the party's direct case in this proceeding.

B. The words "document" and "documentation" are used in their broadest sense and include, without limitation, writings, drawings, graphs, charts, photographs, phono-records, microfilm, microfiche, computer printouts, correspondence, handwritten notes, workpapers, records or reports, bills, checks, articles from journals, or other sources, contracts, agreements, pamphlets, plans, specifications, summaries, studies, and any other data compilations or written matter of any kind from which information can be obtained, and all copies of such documents which bear notations, marginal comments or other markings that differentiate such copies from the original.

C. In the event that documents containing the exact information requested do not exist, but documents do exist that contain portions thereof or which contain substantially similar information, then the definition of "documents" which are to be identified shall include the documents that do exist.

D. Please serve a copy of the responses to these requests on Antony Richard Petrilla via email at [apetrilla@covad.com](mailto:apetrilla@covad.com). Responsive information that is not in electronic form may be sent to Mr. Petrilla at 600 14th Street, NW, Suite 750, Washington, DC 20005 via overnight delivery.

INFORMATION REQUESTS

1. Please indicate what software Verizon deployed for next generation digital loop carrier ("NGDLC") equipment located at remote terminals. For each type or version of software, please indicate the percentage of remote terminals in which the software is deployed.

2. What is the "maintenance window" for performing work on NGDLC equipment that will or does contain CLEC-provided line cards, as referenced in Section 1.2.1.c.2 & 3 of the illustrative PARTS tariff?

3. Please provide a copy of the procedures by which CLECs may have line cards included on the list of approved equipment, discussed in Section 1.1.1.D.2.a of the illustrative PARTS tariff.

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4. Please describe the process by which CLECs would manage the "inventory of line cards in collocation space in the serving wire center," as referenced in Section 1.2.1.c.2 of the illustrative PARTS tariff.
5. Please describe the process for waiving termination liability, discussed in Section 1.5.1 & 1.5.2 of the illustrative PARTS tariff, when disconnection of PARTS service results from provisioning delays beyond the CLEC's control and/or caused by Verizon.
6. Please describe the process and criteria by which Verizon will determine to assess false dispatch and/or customer not ready charges, discussed in Section 1.6.1.L of the illustrative PARTS tariff.
7. Please describe what pro-active communications Verizon will initiate with CLECs to avoid assessing the false dispatch and/or customer not ready charges, discussed in Section 1.6.1.L of the illustrative PARTS tariff.
8. Please describe Verizon's procedures for returning unused line cards to the CLEC collocation space, described in Section 1.2.1.C.2 of the illustrative PARTS tariff.
9. Please indicate what the expected maintenance inventory level for the line cards, described in Section 1.2.1.C.2 of the illustrative PARTS tariff, would be.
10. Please indicate whether any carriers in Massachusetts, other than Verizon, provide transport facilities between Verizon remote terminals and Verizon central offices. For each such carrier, please list which remote terminals are served by such alternative transport facilities.
11. Please indicate whether equipment in Verizon's remote terminals provides -48 volts and ground to Verizon's retail voice customers.